

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Case No. 1:24-cv-10049

NOTICE OF MOTION AND MOTION TO SEAL OR REDACT PERSONAL INFORMATION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Mario Armando Lavandeira, Jr., also known publicly as Perez Hilton, hereby respectfully moves this Court for an order to seal or redact any personal identifying information, including but not limited to my residential address, email address, and phone number from the public docket and any filed affidavits, declarations, or documents associated with attempted service of a subpoena and any related proceedings in this matter.

This motion is made on the following grounds:

1. The information at issue constitutes sensitive personal identifying information.
2. Public disclosure of such information could pose a risk to privacy, safety, and personal security.
3. Sealing or redacting the information is narrowly tailored and necessary to prevent harm.
4. Courts have recognized the need to protect such personal data from public dissemination.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

/s/ Mario Lavandeira

Mario Armando Lavandeira, Jr.

aka Perez Hilton